

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Peabody Access Telecommunications, Inc.**

Peabody Access Telecommunications, Inc. submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Peabody Access Telecommunications, Inc. (PAT) is an independent, non-profit, membership-based, Board of Directors-governed organization established in 2006 to manage facilities for non-commercial PEG access programming in the City of Peabody, MA.

1. PAT operates three channels: Public, Educational and Government on the Comcast cable system.
2. PAT’s channels are carried on the basic tier. However, due to Comcast’s recent conversion to all digital channels, subscribers must have a TV with a QAM tuner or a digital adapter from the cable provider to view our channels.
3. PAT carries the same number of PEG channels (3) on the Comcast system that were carried in June 2010.
4. Unfortunately, Comcast does not allow for distribution of our programming schedule on the cable system on-screen program guide. Residents must navigate to our web site or bulletin board in between programming to view our programming schedule, though

we also provide all necessary data required for inclusion on an on-screen program guide.

5. We are not an AT&T U-verse community.
6. There are a couple of instances where PEG centers are at a significant disadvantage compared with broadcast and cable channels. First, despite the fact that the industry has moved to HD, Comcast will not provide us with HD channels. Second, like dozens of other PEG access providers, we were affected by a recent Must-Carry request that resulted in the relocation of our Public Access Channel from Channel 10 to Channel 99. Thus, while our Education and Government Channels remain on 8 and 9 respectively, our viewers must search for Channel 99 in order to view community programming. PAT was forced to spend unbudgeted money to advertise the change, not to mention address the confusion the change causes our viewers and producers.

Signed:

Camille Bartlett

Dated:

9/10/12

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